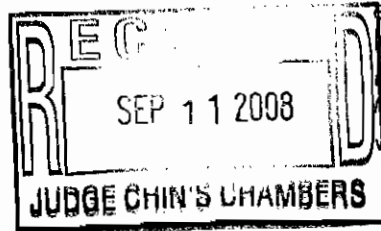


# MEMO ENDORSED

ORRICK

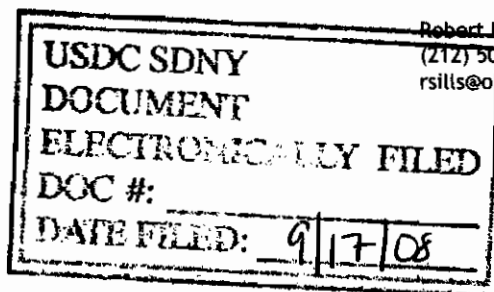


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September 11, 2008

**BY HAND**

Hon. Denny Chin  
United States District Judge for  
the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1020  
New York, New York 10007



Robert L. Sills  
(212) 506-5110  
rsills@orrick.com

**Telenor East Invest AS v. Altimo Holdings & Investments, Ltd., et al.,  
07 Civ. 4829 (DC)**

Dear Judge Chin:

On behalf of all parties, I write to request an extension of the discovery schedule set forth in our April 24, 2008 letter to the Court, as endorsed by Your Honor at the pre-trial conference on May 2, 2008.

The parties have diligently proceeded with discovery under the schedule set by the Court. The parties have exchanged discovery requests and responses pursuant to Rules 26, 33 and 34. Document collection and review, however, has taken longer than anticipated, because the operative documents are located around the world and are in several different languages. In particular, collecting and processing the large amounts of electronic data and foreign language documents located abroad has complicated the document review and production process. While the parties exchanged initial productions of responsive documents on August 22, 2008, we do not believe we can complete fact discovery by December 12, 2008, as set forth in the current schedule.

Under the circumstances, the parties respectfully request that the discovery schedule be extended as follows:

- On and after September 19, 2008, but no later than November 12, 2008, the parties may serve second or subsequent requests for documents.
- No later than October 24, 2008, the parties will serve responses to any second or subsequent requests for documents served on September 19, 2008, produce documents responsive to such requests to which the parties have no objection and serve appropriate supplements to privilege logs.



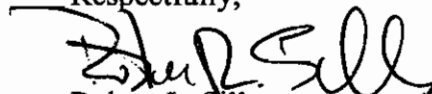
O R R I C K

The Honorable Denny Chin  
September 11, 2008  
Page 2

- For second or subsequent document requests served after September 19, 2008, the parties will have 45 days to serve responses, produce documents responsive to such requests to which the parties have no objection and serve appropriate supplements to privilege logs.
- No later than February 27, 2009, the parties will complete depositions and conclude all other fact discovery.


No party has previously requested an extension of the discovery schedule in this matter.

Respectfully,

  
Robert L. Sills

Copies (by e-mail and first class mail):  
Ronald S. Rolfe, Esq.  
Edward T. Schorr, Esq.

All discovery --  
fact and expert --  
shall be complete by  
2/27/09. <sup>FINAL.</sup> The PTC is  
adjourned to 2/27/09  
at 10 am.  
SO ORDERED.

  
WSDJ  
9/17/08